



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Nicholas F. Moles, Treasurer  
Tropicana Resort & Casino Political  
Action Committee  
3801 Las Vegas Boulevard (S)  
Las Vegas, NV 89109

APP 5 200

Identification Number: C00331082

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Moles:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$9,200.00 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$7,180. Please amend your report to clarify the discrepancy.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

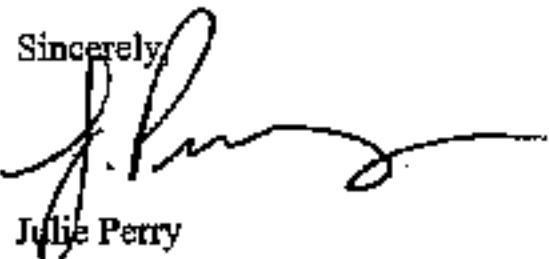
-For your information, each category on the Detailed Summary Page for

which your committee discloses activity must have a separate schedule.  
Please note this for future filings.

-Please amend Schedule B supporting Line 23 by providing the office sought (House, Senate, or President), state, and congressional district (if applicable) for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Julie Perry  
Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Contributed Summary Page	
Contributions from Individuals		PAGE OF FOR LINE NUMBER 11(a)(i)	
Any information copied from such Report and Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
<input checked="" type="checkbox"/> Name of Committee/PAC <b>National Organization PAC C00000001</b>			
A. Full Name, Mailing Address and ZIP Code Anne Sullivan 21 13th Street City, State 2102		Date of Receipt 8/19/94 Description National Organization, Inc. Manager Branch Manager Aggregate Year-to-Date > 1	Amount of Each Receipt Due Period \$50.00 (\$15 biweekly)
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Receipts			
B. Full Name, Mailing Address and ZIP Code Rodney Jones 481 Hainsbury Road City, State 2102		Date of Receipt 8/19/94 Description National Organization, Inc. Vice President Aggregate Year-to-Date > 1	Amount of Each Receipt Due Period \$120.00 (\$20 biweekly)
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Receipts			

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Contributed Summary Page	
Contributions from Individuals		PAGE OF FOR LINE NUMBER 11(a)(i)	
Any information copied from such Report and Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
<input checked="" type="checkbox"/> Name of Committee/PAC <b>National Organization PAC C00000001</b>			
A. Full Name, Mailing Address and ZIP Code Martin L. Krebs 4 River Road City, State 2102		Date of Receipt 8/19/94 Description National Organization, Inc. Chairman Aggregate Year-to-Date > 1	Amount of Each Receipt Due Period \$3,900.00 (\$1,000 (RAFFLE PRIZE))
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Receipts			

SCHEDULE B ITEMIZED DISBURSEMENTS		Use separate schedule for each category of the Contributed Summary Page	
Operating Expenditures/Other Federal		PAGE OF FOR LINE NUMBER 21(b)	
Any information copied from such Report and Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
<input checked="" type="checkbox"/> Name of Committee/PAC <b>National Organization PAC C00000001</b>			
A. Full Name, Mailing Address and ZIP Code Martin L. Krebs 4 River Road City, State 2102		Payment of Disbursement coffee prizes Description 8/19/94	Date of Disbursement 8/19/94 Description \$3,900.00 (IN-KIND (CONTINUATION))
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Receipts			

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$385. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.

